

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
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CANDY M. SOUSA, On Behalf of Herself
and All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,
JOHN E. BAGALAY, JR., STEVEN K.
SPRAGUE and GERARD T. FEENEY,

Defendant.

YOSEF STREICHER, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,
JOHN E. BAGALAY, JR., STEVEN K.
SPRAGUE and GERARD T. FEENEY,

Defendant.

Civil Action No. 04-cv-30022 (MAP)

U.S. DISTRICT COURT
DISTRICT OF MASS.

Civil Action No. 04-cv-30026 (MAP)

**NOTICE OF MOTION OF THE TREBITSCH GROUP'S
REQUEST FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS,
AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

RAFAT DAWOD,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,
STEVEN SPRAGUE and GERARD T.
FEENEY,

Defendant.

Civil Action No. 04-cv-30029 (MAP)

ALVIN CHESS, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-cv-30037 (MAP)

v.

WAVE SYSTEMS CORPORATION,
STEVEN K. SPRAGUE and GERARD T.
FEENEY,

Defendant.

MICHAEL VICKER, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-cv-30040 (MAP)

v.

WAVE SYSTEMS CORPORATION,
JOHN E. BAGALAY, JR., STEVEN K.
SPRAGUE and GERARD T. FEENEY,

Defendant.

[ADDITIONAL CAPTIONS ON NEXT PAGE]

H. MARTIN BOHMAN, On Behalf of All
Others Similarly Situated,

Plaintiff,

Civil Action No. 04-cv-30041 (MAP)

v.

WAVE SYSTEMS CORPORATION,
STEVEN SPRAGUE and GERARD T.
FEENEY,

Defendant.

JIMMY SUO, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-cv-30042 (MAP)

v.

WAVE SYSTEMS CORPORATION,
STEVEN SPRAGUE and GERARD T.
FEENEY,

Defendant.

JACK SCHULMAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-cv-30043 (MAP)

v.

WAVE SYSTEMS CORPORATION,
STEVEN SPRAGUE and GERARD T.
FEENEY

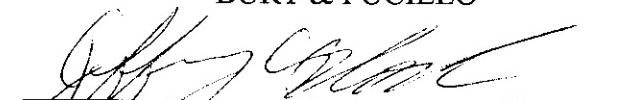
Defendant.

The members of the Trebitsch Group, by their counsel, hereby respectfully move this Court to: (i) consolidate all related actions; (ii) be appointed Lead Plaintiffs in the consolidated securities class action; and (iii) approve their selection and retention of Zimmerman, Levi & Korsinsky LLP as Lead Counsel and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

In support of this Motion, the proposed lead plaintiffs submit herewith a Memorandum of Law, the Declaration of Eduard Korsinsky, Esq., and a Proposed Order.

Dated: April 1, 2004

BERMAN DEVALERIO PEASE TABACCO
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Proposed Lead Counsel for Plaintiffs